

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers

D.T.E. 03-60

LIGHTSHIP TELECOM, LLC'S PETITION TO INTERVENE

Pursuant to 220 C.M.R. § 1.03, counsel for Lightship Telecom, LLC ("Lightship") hereby petitions the Department of Telecommunications and Energy ("Department") to intervene in the above-referenced proceeding, stating in support thereof the following:

1. Lightship is a Competitive Local Exchange Carrier ("CLEC") that provides local exchange, exchange access, interexchange telecommunications services to small, medium, and large size business customers throughout the Commonwealth of Massachusetts. In provisioning its services, Lightship utilizes Unbundled Network Elements ("UNEs") offered by Verizon-Massachusetts ("Verizon-MA"), especially a combination of loop, switching, and transport facilities (otherwise known as UNE-Platform or UNE-P) that are currently available to Lightship as UNEs pursuant to 47 U.S.C. § 251(c)(3).

3. On August 26, 2003, the Massachusetts Department of Telecommunications and Energy ("Department") initiated this nine month proceeding to implement the FCC's Triennial Review Order regarding switching for mass market customers. On September 9, 2003, the Department expanded the scope of the proceeding to address loops, transport, and hot cut issues. Consistent with the Triennial Review Order, it is expected that the Department will investigate whether switching to mass market customers and certain DS1, DS3, and dark fiber loops and transport routes are available to CLECs as UNEs.

4. Lightship requests that it be permitted to intervene as participant in this proceeding so that it may represent and protect its interests during it. Lightship will be substantially and specifically affected by the Department's review and decision in this docket because it is a

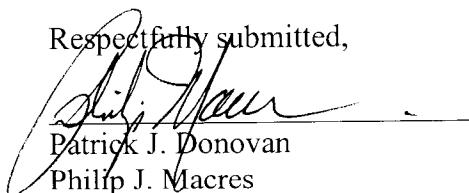
customer and competitor of Verizon. Any changes to the availability of UNEs or the rates, terms and conditions in using them directly affect Lightship's ability to compete with Verizon. In this proceeding, Lightship seeks the opportunity respond and possibly submit supporting evidence regarding any proposed changes that limit the availability various UNEs, especially mass market switching, that are critical to its business plan. Therefore, Lightship's interests cannot be adequately represented without the Department granting this petition.

5. In making this request, Lightship asks that all communications and correspondence for this proceeding be directed to the undersigned counsel and the following individual at Lightship:

Nego Pile
Lightship Telecom, LLC
1301 Virginia Drive
Suite 120
Fort Washington, PA 19034
Tel: (215) 641 0894
Fax: (215) 641-0531
Email: npile@lightship.net

WHEREFORE, Lightship respectfully requests that the Department grant it the right to intervene in this proceeding.

Respectfully submitted,



Patrick J. Donovan
Philip J. Macres
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 424-7645
Email: pjdonovan@swidlaw.com
Email: pjmacres@swidlaw.com

Counsel for Lightship Telecom, LLC

Dated: September 15, 2003